

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	Civil Action No. 04-12024-RGS
)	
ONE 2001 TOYOTA SEQUOIA, BEARING)	
VEHICLE IDENTIFICATION NUMBER)	
5TDBT48A31S055061, and)	
MASSACHUSETTS REGISTRATION NUMBER)	
7655YI, and ONE 2003 LEXUS SC430,)	
VEHICLE IDENTIFICATION NUMBER)	
JTHFN48Y130045173, and)	
MASSACHUSETTS REGISTRATION NUMBER)	
42MS06,)	
Defendants.)	

MOTION FOR FINAL JUDGMENT AND ORDER OF FORFEITURE

The United States of America, by its attorney Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby moves for entry of a Final Judgment and Order of Forfeiture, forfeiting the defendant vehicles, described as one 2001 Toyota Sequoia, Vehicle Identification Number 5TDBT48A31S055061, and Massachusetts Registration Number 7655YI, registered in the name of Erick Donis, and one 2003 Lexus SC430, Vehicle Identification Number JTHFN48Y130045173, and Massachusetts Registration Number 42MS06, registered to Toyota Motor Credit Corporation, and leased to Erick Donis (the "Defendant Vehicles").

In support of this Motion, the Government states that on December 23, 2004, it filed a Motion for Entry of Default against the claimants in this action, and on March 2, 2005, this Court

entered two Notices of Default, copies of which are attached hereto as Exhibits A and B. The Notices were entered against Erick J. Donis, Jenny Jazmin Saenz, and all other persons claiming an interest in the Defendant Vehicles, for their failure to answer or otherwise defend in this action. No other claims have been filed, and the time to do so has expired.

WHEREFORE, the United States of America requests that this Court enter a Final Judgment and Order of Forfeiture, forfeiting the Defendant Vehicles. A proposed Order is attached.

Respectfully submitted,

UNITED STATES OF AMERICA
By its attorneys,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/Shelbey D. Wright
Shelbey D. Wright
Assistant U.S. Attorney
1 Courthouse Way
Suite 9200
Boston, MA 02210
(617) 748-3100

Dated: March 16, 2005

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